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SIPDIS

USDOC FOR 532/OEA/LHINES/DFARROW  
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR  
WILLIAM ZARIT  
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

BEIJING FOR FCS JEANETTE CHU

SIPDIS

E.O. 12958: N/A  
TAGS: [BMGT](#) [BEXP](#) [HK](#) [ETRD](#) [ETTC](#)  
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION:  
SHINGING LAND TECHNOLOGY

REF: A) USDOC 03922

1.Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

12. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) attempted to conduct a post-shipment verification of a shipment bound for Shining Land Technology (Hong Kong) Co. Ltd, MSH 3179, Room 1007, 10F, Ho King Ctr., No 2-16 Fa Yuen Street, Mongkok, Hong Kong (Shining Land). The item in question is one gas chromatograph valued at USD 16,311. On the applicable shippers export declaration (SED), the item is classified as 3A999. Items properly classified as 3A999 may be exported/reexported to virtually all destinations and end-users worldwide, license free, except for certain designated state sponsors of terrorism (including North Korea). The exporter was Agilent Technologies Inc. of New Castle, Delaware.

13. According to the Hong Kong Companies Registry, Shining Land has been in existence since June 2006. It has the equivalent of USD 100 authorized capital but no paid-up capital. Mainland Chinese nationals Chuanjian Lu and Xiaochun Qian are listed as directors. No further information about the company (including its phone number) could be located in the Hong Kong Trade Development Council web site, the Yellow Pages or other typical places. The contact number for Shining Land referenced in reftel A is a Shanghai number. An Internet check of the phone number reveals that this number is apparently also the phone number of Shanghai company, Shanghai Hushi Chemical Reagent & Analysis Instrument Company Limited ([www.shhushi.com](http://www.shhushi.com)) and its subsidiary companies Shanghai Experimental Equipment Company Limited and Tianchang Qianqiu Glass Instrument Company Limited. The address of these companies listed on the web site is the same as the address listed for the mainland Chinese directors of Shining Land. The phone number for Shining Land listed in reftel A also corresponds to the phone number listed on the web sites for these companies. As part of end-

use checks in Hong Kong and at the direction of BIS headquarters, the ECO's practice is not to call or otherwise reach out to mainland Chinese companies involved in Hong Kong related checks.

¶4. The offices of Shining Land are located in a low-end shopping area. Ho King Center is on top of a street market and is a run-down office building. On the building directory, Room 1007 is listed as "Bright Sun Shipping Company". However, nothing is listed for this office number on the 10th floor directory nor is there any name listed on the Room 1007 office door. Offices on the 10th floor appear to be quite small, perhaps 100-150 square feet (enough for two desks). Commercial Assistant Florence Tam attempted to visit the office on June 11, 2007 but no one was in the office. Mail and other correspondence were left stacked at the entrance of the company.

¶5. Given the facts referenced above, Shining Land does not appear to be a suitable recipient of controlled U.S. origin items. Nonetheless, a close review of publicly available documentation concerning Shining Land and other companies suggests that the item most likely ended up in mainland China at Shanghai Hushi Chemical Reagent & Analysis Instrument Company Limited or one of its affiliates. Given that the item can be exported license-free to mainland China (with very limited exceptions), the ECO recommends that this PSV be classified as Limited.